

ABELSON & TRUESDALE, LLC.

By: Steven J. Abelson, Esq.

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Attorney for Debtor

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In Re:

JOHN PAOLUCCI

Debtor

:
:
: Case No. 15-26923
:
: Chapter 13
:
: Hearing Date: March 26, 2019
:
: Judge: Hon. Michael B. Kaplan

COUNSEL'S LIMITED OBJECTION TO MOTION FOR RELIEF FROM STAY

Steven J. Abelson, counsel to the Debtor, submits the following limited objection to the Motion for Relief from Stay:

1. I am attorney at law of the State of New Jersey, this District, a member of the above law firm and have been tasked with the representation of the Debtor in this matter.
2. The Debtor is in receipt of the Motion for Relief from Stay filed by Toyota Motor Credit Corporation (Document # 22).
3. While the Debtor takes no position as to whether stay relief is legally required for the lessor of a vehicle with a matured lease to sell said vehicle, the Debtor does not oppose the entry of stay relief.
4. The Debtor however would like the Order granting the same to memorialize the fact that the lifting of the stay in this particular instance does not effect the Debtor's chapter 13 plan and therefore should not serve as grounds for a motion to dismiss by the chapter 13 Trustee nor require the Debtor to modify his chapter 13 plan.

CERTIFICATION

I hereby certify that the foregoing statements are true. If any of the foregoing statements are wilfully false, we realize that we are subject to punishment.

Dated: March 21, 2019

/s/ Steven J. Abelson.
Steven J. Abelson, Esq.
Attorney for Debtor